

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
UNITED STATES OF AMERICA	:	
	:	No. 22-CR-240 (AKH)
- v. -	:	
	:	
SUNG KOOK (BILL) HWANG and	:	
PATRICK HALLIGAN,	:	
	:	
Defendants.	:	
	:	
-----	X	

**DEFENDANT PATRICK HALLIGAN’S  
NOTICE OF MOTIONS *IN LIMINE***

---

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated March 21, 2024; the Declaration of Mary E. Mulligan, dated March 21, 2024, and the exhibits annexed thereto; and all other papers and proceedings herein, Defendant Patrick Halligan, by and through his counsel, hereby moves this Court, before the Honorable Alvin K. Hellerstein, at a date and time to be set by the Court, at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 706, New York, New York 10007, for an Order (1) precluding the government from offering evidence of misrepresentations that pre-date the charged conspiracy; (2) precluding the government from offering testimony from counterparty employees that alleged misrepresentations were “material”; (3) precluding the government from offering improper speculative and conclusory evidence concerning Mr. Halligan’s state of mind based on his former position as Archegos’s Chief Financial Officer; (4) precluding the government from introducing evidence of alleged misstatements that it did not specify by time, date, speaker, recipient, and content in its

disclosures to the defense, i.e., the Indictment, the Superseding Indictment, its letter to counsel dated August 18, 2022, and the Rule 404(b) notice dated December 12, 2023; (5) precluding the government from asserting without any good faith basis in admissible evidence that Mr. Halligan signed MUFG trade confirmations with knowledge they contained a false statement;

(6) precluding the government from presenting evidence or argument concerning the timing of Mr. Halligan's disclosure of accurate monthly information to counterparties; (7) precluding the government from presenting evidence or argument concerning tax-related "wash sale" or "wash trade" transactions; (8) precluding the government from offering incorrect evidence and argument about Archegos's purported filing and disclosure obligations; (9) precluding the government from introducing any evidence regarding discussions on or after March 26, 2021 concerning Archegos's potential bankruptcy filing or wind-down; and (10) precluding the government from introducing any evidence of alleged misconduct that occurred at Tiger Asia, or any criminal, regulatory, or enforcement proceedings arising from or relating to alleged misconduct at Tiger Asia.

Dated: New York, New York  
March 21, 2024

Respectfully Submitted,

FRIEDMAN KAPLAN SEILER  
ADELMAN & ROBBINS LLP

s/ Mary E. Mulligan

---

Mary E. Mulligan (mmulligan@fklaw.com)  
Timothy M. Haggerty (thaggerty@fklaw.com)  
Bonnie M. Baker (bbaker@fklaw.com)  
Anil Vassanji (avassanji@fklaw.com)  
Rupita Chakraborty (rchakraborty@fklaw.com)  
7 Times Square  
New York, New York 10036-6516  
(212) 833-1100

*Attorneys for Patrick Halligan*